

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re: Kristin Wojnar, Debtor, Selene Finance, LP, Movant, v. Kristin Wojnar, Debtor, Kenneth E. West, Trustee/Respondent.	Bankruptcy No. 25-10399-amc Chapter 13 Related to Doc. No. 3
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**SELENE FINANCE, LP'S OBJECTION TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN**

Selene Finance, LP, ("SELENE"), by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Kristin Wojnar, and in support thereof alleges as follows:

1. Debtor, Kristin Wojnar, filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on January 30, 2025.
2. SELENE holds a security interest in the Debtor's real property located 208 Tree Street, Philadelphia, PA 19148 (the "Property"), by virtue of a Mortgage recorded with the Philadelphia County Recorder of Deeds on January 12, 2021 in Instrument No. 53777062 which has ultimately been assigned to Selene Finance, LP.

3. Said Mortgage secures a Note in the amount of \$206,534.00
4. Upon review of internal records, it is anticipated that SELENE Proof of Claim will include a pre-petition arrearage of approximately \$7,144.78 a true and correct copy of the pre-petition arrearage is attached hereto as Exhibit "A."
5. On January 30, 2025, Debtor filed a Chapter 13 Plan (the "Plan") A true and correct copy of the Plan is attached hereto as Exhibit "B."
6. The Plan fails to account for the full pre-petition arrearage of \$7,144.78 as it only provides a total \$6,809.00 that will be paid to Secured Creditor through the Plan. See Exhibit "B."
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) SELENE hereby objects to Debtor's proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Secured creditor Selene Finance, LP, respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor, Kristin Wojnar.

Respectfully Submitted,

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Authorized Agent for Secured Creditor
13010 Morris Rd., Suite 450
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Phone: (470) 321-7112

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By: /s/Robert Shearer
Robert Shearer, Esquire
Pennsylvania Bar Number 83745
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Date: February 13, 2025

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 13, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Michael A. Cibik
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102

Kenneth E. West
Office of the Chapter 13 Standing Trustee
190 N. Independence Mall West
Suite 701
Philadelphia, PA 19106

United States Trustee

Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Kristin Wojnar
208 Tree St
Philadelphia, PA 19148-3341

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane &
Partners, PLLC**

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Alpharetta, GA 30004
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